

# EXHIBIT 1

## Andrew Mather

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**From:** ptong@raklaw.com  
**Sent:** 21 June 2024 09:38  
**To:** David Perlson  
**Cc:** QE-Google-VirtaMove; Giese, Erica; St. Clair, Nate; Carmona, Katie; JW-Google-IP; Deepa Acharya; rak\_virtamove@raklaw.com; Shani Williams  
**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

[EXTERNAL EMAIL from [ptong@raklaw.com](mailto:ptong@raklaw.com)]

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David,

The Court only just recently decided the dispute over when motions to transfer and PICs would be due, and adopted Virtamove's proposal that they would be due the same day. Thus, we oppose Google's attempt to re-litigate the Court's decision on the scheduling order by seeking a 4-week extension, which is unsupported by good cause. Because you rejected our 1 week extension, you may file your motion for good cause as opposed.

**Peter Tong**

**Russ, August & Kabat**

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | [ptong@raklaw.com](mailto:ptong@raklaw.com) | [www.raklaw.com](http://www.raklaw.com)

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**From:** David Perlson <davidperlson@quinnemanuel.com>

**Date:** Thursday, June 20, 2024 at 7:47 PM

**To:** ptong@raklaw.com <ptong@raklaw.com>

**Cc:** QE-Google-VirtaMove <qe-google-virtamove@quinnemanuel.com>, Giese, Erica <egiese@jw.com>, St. Clair, Nate <nstclair@jw.com>, Carmona, Katie <kcarmona@jw.com>, JW-Google-IP <JW-Google-IP@jw.com>, Deepa Acharya <deepaacharya@quinnemanuel.com>, rak\_virtamove@raklaw.com <rak\_virtamove@raklaw.com>, Shani Williams <Swilliams@raklaw.com>

**Subject:** RE: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

Peter, it is unclear that VirtaMove has actually offered any extension to date that did not come with unreasonable conditions. Your last email indicated VirtaMove's (incorrect) view that its PICS are irrelevant to venue such that no extension should be needed at all.

Of course, it is our, and no doubt the Court's, preference to avoid contested motion practice as we have continually stated. Given that it appears VirtaMove intends to identify accused products in its PICs in addition to and/or other than Migrate to Containers, one week is insufficient. Google needs the 4 weeks to July 23, consistent with the Waco OGP.

Please promptly confirm whether VirtaMove will agree. If so, Google is happy to file its motion seeking its requested extension unopposed, rather than opposed.

David

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**From:** ptong@raklaw.com <ptong@raklaw.com>

**Sent:** Thursday, June 20, 2024 4:00 PM

**To:** David Perlson <davidperlson@quinnemanuel.com>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>; Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>; St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>; Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>; JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>; Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>; [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com); Shani Williams <[SWilliams@raklaw.com](mailto:SWilliams@raklaw.com)>  
**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

[EXTERNAL EMAIL from [ptong@raklaw.com](mailto:ptong@raklaw.com)]

David,

We don't understand why an opposed motion to extend the deadline is necessary, as we have offered a one-week extension and offered to promptly identify the complete set of accused products. We are on track to serve our PICs on June 25 and reiterate our standing offer to extend Google's motion to transfer by 1 week, until July 2. Does that address your concerns, or does Google need the full month?

**Peter Tong**

**Russ, August & Kabat**

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | [ptong@raklaw.com](mailto:ptong@raklaw.com) | [www.raklaw.com](http://www.raklaw.com)

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**From:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Date:** Thursday, June 20, 2024 at 12:16 PM

**To:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>, Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>, [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com) <[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>, Shani Williams <[SWilliams@raklaw.com](mailto:SWilliams@raklaw.com)>

**Subject:** RE: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

Peter, for VirtaMove to contend that the actual contentions of infringement it intends to pursue in the case are irrelevant to the transfer analysis is not a serious position. The cases you cite certainly do not say that. We will proceed with an opposed motion.

David

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**From:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Sent:** Wednesday, June 19, 2024 11:58 AM

**To:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>; Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>; St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>; Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>; JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>; Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>; [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com); Shani Williams <[SWilliams@raklaw.com](mailto:SWilliams@raklaw.com)>

**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

[EXTERNAL EMAIL from [ptong@raklaw.com](mailto:ptong@raklaw.com)]

David,

If the addition of new accused products is driving this delay, then the whole thing is moot. I propose we agree to be bound by

- *Hoffman v. Blaski*, 363 U.S. 335, 343 (1960)
- *In re EMC Corp.*, 501 F. App'x 973, 976 (Fed. Cir. 2013)

for the principle that transfer motions are decided based on the facts of the pleadings, at the time of the pleadings, and not the subsequent activities or subsequent contentions of the parties.

**Peter Tong**

**Russ, August & Kabat**

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | [ptong@raklaw.com](mailto:ptong@raklaw.com) | [www.raklaw.com](http://www.raklaw.com)

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**From:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Date:** Wednesday, June 19, 2024 at 1:40 PM

**To:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>, Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>, [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com) <[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>, Shani Williams <[Swilliams@raklaw.com](mailto:Swilliams@raklaw.com)>

**Subject:** RE: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

Peter, if VirtaMove will not be adding accused products beyond Migrate to Containers in its PICs, then a one-week extension of the date for a venue motion would be sufficient, or possibly unnecessary. Please confirm whether VirtaMove will be adding additional products beyond Migrate to Containers in its PICs.

David

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**From:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Sent:** Wednesday, June 19, 2024 9:07 AM

**To:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>; Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>; St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>; Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>; JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>; Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>; [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com); Shani Williams <[Swilliams@raklaw.com](mailto:Swilliams@raklaw.com)>

**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

[EXTERNAL EMAIL from [ptong@raklaw.com](mailto:ptong@raklaw.com)]

I'm trying to confirm whether that is the case and may be able to get you a timely answer on additional products. My question is *if* that is the case, then is 1 week enough? If 1 week will be enough, we can work on the other details. If 1 week is not enough, we need not discuss the rest.

**Peter Tong**

**Russ, August & Kabat**

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | [ptong@raklaw.com](mailto:ptong@raklaw.com) | [www.raklaw.com](http://www.raklaw.com)

---

**From:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Date:** Wednesday, June 19, 2024 at 11:01 AM

**To:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>, Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>, [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)

<[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>, Shani Williams <[Swilliams@raklaw.com](mailto:Swilliams@raklaw.com)>

**Subject:** RE: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

Peter, sorry I don't follow. Are you saying that VirtaMove does not intend on adding any accused products beyond Migrate to Containers in its PICs? Please confirm so we can evaluate your suggestion of a one-week extension.

David

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**From:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Sent:** Wednesday, June 19, 2024 6:28 AM

**To:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>; Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>; St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>; Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>; JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>; Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>; [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com); Shani Williams <[Swilliams@raklaw.com](mailto:Swilliams@raklaw.com)>

**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

[EXTERNAL EMAIL from [ptong@raklaw.com](mailto:ptong@raklaw.com)]

David,

We appreciate your explanation. I want to determine if we can reach any agreement. If we assume that Google has fair notice of accused products and can work something out on the PICs issue (i.e. set these things aside), if you receive a 1 week extension that we typically offer, is that enough? If the answer is no, then you will need to file your motion seeking good cause to move for transfer late. If the answer is yes, then we may be able to work something out.

**Peter Tong**

**Russ, August & Kabat**

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | [ptong@raklaw.com](mailto:ptong@raklaw.com) | [www.raklaw.com](http://www.raklaw.com)

---

**From:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Date:** Tuesday, June 18, 2024 at 9:35 PM

**To:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>, Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>, [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com) <[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>

**Subject:** RE: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

Peter, Google needs to know what is actually accused to consider and investigate any venue motion. If Google needs to bring a venue motion on the same date it receives the VirtaMove's infringement contentions, that is not possible. Google's request is consistent with the Waco OGP, which provides the same 4 week window between infringement contentions and the transfer motion that Google is suggesting. It was our hope that we could reach agreement on this in an agreed/unopposed motion, as you note. It is fair, and we would not use this requested extension of the venue date against VirtaMove.

Changing the date for venue motion would not require changing any other dates in the schedule because none of them are tied to the venue motion date. That is in contrast to VirtaMove's infringement contentions, which all the following

dates in the schedule are keyed off of, as we have explained previously. While Google does not object in theory to VirtaMove seeking additional time for infringement contentions, moving those the same amount of time as the venue motion date is unworkable for the reasons stated above and would put Google in the same position it is seeking to remedy. Because extending the June 25 date for PICs would affect the remaining dates in the schedule, if VirtaMove wants to propose that, then please provide a schedule to account for it. But please do so promptly as to the extent we are unable to reach agreement on this issue we may need to file an opposed motion shortly.

In all events, if VirtaMove is unwilling to agree to Google's requested extension of the venue motion date, can you tell us whether you plan to add additional accused products beyond Migrate to Containers in your PICs? Again, if VirtaMove intends to add additional products, Google needs disclosure of those products and infringement contentions to consider and investigate any venue motion as noted above.

As we noted, we are happy to discuss as well.

David

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**From:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Sent:** Tuesday, June 18, 2024 2:50 PM

**To:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>; Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>; St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>; Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>; JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>; Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>; [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)

**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

[EXTERNAL EMAIL from [ptong@raklaw.com](mailto:ptong@raklaw.com)]

David,

One month is far too long. That being said, we are generally open to giving short extensions here and there, so long as 1) it is fair and 2) not used against us, as a matter of professional courtesy. We will agree not to oppose any motion for a second extension up to 1 week from the June 25 deadlines if it is fair and not used against us.

The Court's schedule appears to have adopted our argument that June 25 gives fair and equal notice to both sides for contentions and transfer motions. It that you successfully persuaded the Court that the June 25 date was the first "extension" that necessitated many additional extensions to the rest of the schedule.

In fairness, would you be amenable to equally extending the PIC deadline? And so it is not used against us, can you propose something that does not push out the rest of the schedule (i.e. affect *Markman* discovery and/or trial)?

If so, please circulate a proposed schedule for review. We will need to file a motion for this. Judge Gilliland requires extensions by motion, not stipulation.

**Peter Tong**

**Russ, August & Kabat**

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | [ptong@raklaw.com](mailto:ptong@raklaw.com) | [www.raklaw.com](http://www.raklaw.com)

---

**From:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Date:** Tuesday, June 18, 2024 at 2:53 PM

**To:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>, Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>, [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com) <[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>

**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

Counsel, following up on this request.

David

---

**From:** David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>

**Date:** Monday, June 17, 2024 at 7:30 PM

**To:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>, Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>, [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com) <[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>

**Subject:** VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Extension Request

Peter, the Court's Scheduling Order issued today includes June 25 as the "Deadline for any venue or jurisdictional motion without good cause." Please let us know whether plaintiff will agree to an extension of this date to July 23, which would be consistent with the deadline for such motions in the Waco OGP. We would appreciate if you could let us know as soon as possible given the deadline is just over a week away. We are happy to discuss if helpful.

David

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**From:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Date:** Wednesday, June 12, 2024 at 5:26 PM

**To:** Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>, [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com) <[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>

**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Draft Protective Order and ESI Order

[EXTERNAL EMAIL from [ptong@raklaw.com](mailto:ptong@raklaw.com)]

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Deepa,

Sorry, but I won't be able to get back to you on this until next week. Several more urgent deadlines have cropped up, and many of our attorneys are in trial this week.



Peter Tong

**Russ, August & Kabat**

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | [ptong@raklaw.com](mailto:ptong@raklaw.com) | [www.raklaw.com](http://www.raklaw.com)

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**From:** [ptong@raklaw.com](mailto:ptong@raklaw.com) <[ptong@raklaw.com](mailto:ptong@raklaw.com)>

**Date:** Friday, June 7, 2024 at 11:08 AM

**To:** Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>, [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)  
<[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>

**Subject:** Re: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Draft Protective Order and ESI Order

Hi Deepa,

I'll send some revisions first half of next week.

Peter Tong

**Russ, August & Kabat**

4925 Greenville Avenue, Suite 200 | Dallas, Texas 75206

Main +1 310 826 7474 | [ptong@raklaw.com](mailto:ptong@raklaw.com) | [www.raklaw.com](http://www.raklaw.com)

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**From:** Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>

**Date:** Friday, June 7, 2024 at 10:30 AM

**To:** [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com) <[rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)>

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>, Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>, David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>, St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>, Carmona, Katie <[kcarmona@jw.com](mailto:kcarmona@jw.com)>, JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>

**Subject:** RE: VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Draft Protective Order and ESI Order

Counsel,

Following up on this.

Best,  
Deepa

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**Deepa Acharya**

**Quinn Emanuel Urquhart & Sullivan, LLP**

T: +1 (202) 538-8107

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**From:** Deepa Acharya <[deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)>

**Sent:** Friday, May 17, 2024 5:29 PM

**To:** [rak\\_virtamove@raklaw.com](mailto:rak_virtamove@raklaw.com)

**Cc:** QE-Google-VirtaMove <[qe-google-virtamove@quinnemanuel.com](mailto:qe-google-virtamove@quinnemanuel.com)>; Giese, Erica <[egiese@jw.com](mailto:egiese@jw.com)>; David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>; St. Clair, Nate <[nstclair@jw.com](mailto:nstclair@jw.com)>; Carmona, Katie



<[kcarmona@jw.com](mailto:kcarmona@jw.com)>; JW-Google-IP <[JW-Google-IP@jw.com](mailto:JW-Google-IP@jw.com)>

**Subject:** VirtaMove, Corp. v. Google LLC, 7:24-CV-00033-DC-DTG - Draft Protective Order and ESI Order

Counsel,

Attached are Google's drafts of the protective order and ESI order for this case. Please let us know if you have any edits or comments. We would like to get these filed in advance of the parties producing any documents in this case.

Best,  
Deepa

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**Deepa Acharya | Partner**  
**Quinn Emanuel Urquhart & Sullivan, LLP**  
1300 I Street NW, Suite 900  
Washington, DC 20005  
T: +1 (202) 538-8107  
F: +1 (202) 538-8100  
E: [deepaacharya@quinnemanuel.com](mailto:deepaacharya@quinnemanuel.com)

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